

## REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed August 29, 2005. Reconsideration and allowance of the application and pending claims are respectfully requested.

### **I. Claim Rejections - 35 U.S.C. § 102(b)**

Claims 1, 2, 4-8, 10, 12, 14, 15, 17-19, 21, and 22 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Felman, et al. ("Felman," U.S. Pat. No. 6,205,020). Applicant respectfully traverses this rejection.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(b).

As is noted above, independent claims 1, 10, 14, and 21 have been amended through this Response. In view of those amendments, Applicant respectfully submits that the rejection is moot as having been drawn against those claims in a previous form. With particular regard to independent claims 1, 10, and 14, Felman does not teach a connector panel of a single, integrated unit, the connector panel comprising connection elements that are configured to "directly connect" the connector panel to a "computer chassis". In contrast, Felman teaches tabs 102 that "cooperatively engage" a tab 100 on an "option card module 14." See Felman, column 7, lines 53-56. Therefore, Felman's tabs do not directly connect to a computer chassis.

With particular regard to independent claim 21, Felman does not teach a method in which a motherboard module is installed into a computer chassis “without sliding the motherboard module into place”. In contrast, Felman’s system board 16 is slid in place into the computer 10. Felman describes this form of installation as being significant. See Felman, column 7, lines 33-44 and column 8, lines 5-13.

## **II. Claim Rejections - 35 U.S.C. § 103(a)**

### **A. Rejection of Claims 3, 11, 16, and 23**

Claims 3, 11, 16, and 23 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Felman in view of Sacherman, et al. (“Sacherman,” U.S. Pat. No. 5,973,926). Applicant respectfully traverses this rejection.

As has been acknowledged by the Court of Appeals for the Federal Circuit, the U.S. Patent and Trademark Office (“USPTO”) has the burden under section 103 to establish a *prima facie* case of obviousness by showing some objective teaching in the prior art or generally available knowledge of one of ordinary skill in the art that would lead that individual to the claimed invention. *See In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). The Manual of Patent Examining Procedure (MPEP) section 2143 discusses the requirements of a *prima facie* case for obviousness. That section provides as follows:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference

teaching. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and reasonable expectation of success must be found in the prior art, and not based on applicant's disclosure.

As is identified above, Felman does not teach limitations of Applicant's independent claims. In that Sacherman does not remedy the deficiencies of the Felman reference, Applicant respectfully submits that claims 3, 11, 16, and 23 are allowable over the Felman/Sacherman combination for at least the same reasons that claims 1, 10, 14, and 21 are allowable over Felman.

**B. Rejection of Claims 9, 13, 20, 24, and 25**

Claims 9, 13, 20, 24, and 25 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Felman in view of Anderson, et al. ("Anderson," U.S. Pat. No. 6,550,877). Applicant respectfully traverses this rejection.

As is identified above, Felman does not teach limitations of Applicant's independent claims. In that Anderson does not remedy the deficiencies of the Felman reference, Applicant respectfully submits that claims 9, 13, 20, 24, and 25 are allowable over the Felman/Anderson combination for at least the same reasons that claims 1, 10, 14, and 21 are allowable over Felman.

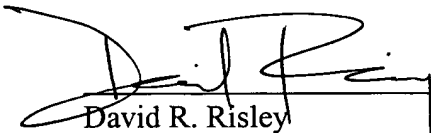
### **III. Canceled Claims**

Claims 8, 19, and 23 have been canceled from the application without prejudice, waiver, or disclaimer. Applicant reserves the right to present these canceled claims, or variants thereof, in continuing applications to be filed subsequently.

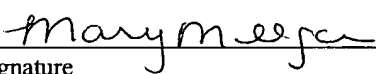
**CONCLUSION**

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

  
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